

# **Exhibit A**

## LETTER OF REQUEST COMMISSION ROGATOIRE

**Hague Convention of 18 March 1970 on the  
Taking of Evidence Abroad in Civil or Commercial Matters**  
*Convention de La Haye du 18 mars 1970 sur  
l'obtention des preuves à l'étranger en matière civile ou commerciale*

<b>1.</b>	<b>Sender</b> <i>Expéditeur</i>	The Honorable William C. Bryson Visiting Judge, United States District Court, District of Delaware U.S. Court of Appeals Howard T. Markey National Courts Building 717 Madison Place, N.W. Washington, DC 20439-0000 Telephone: +1 202 275 8620
<b>2.</b>	<b>Central Authority of the Requested State</b> <i>Autorité centrale de l'État requis</i>	Division for Criminal Cases and International Judicial Co-operation Ministry of Justice S-103 33 Stockholm Sweden Telephone: +46 8 405 45 00 Email: <a href="mailto:ju.birs@gov.se">ju.birs@gov.se</a>
<b>3.</b>	<b>Person to whom the executed request is to be returned</b> <i>Personne à qui les pièces constatant l'exécution de la demande doivent être renvoyées</i>	Anthony J. Fuga <a href="mailto:anthony.fuga@hkllaw.com">anthony.fuga@hkllaw.com</a> HOLLAND & KNIGHT LLP 150 N Riverside Plaza, Suite 2700 Chicago, IL 60606
<b>4.</b>	<b>Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request</b> <i>Indiquer la date limite à laquelle l'autorité requérante désire recevoir la réponse à la commission rogatoire</i>	
	<b>Date</b> <i>Date limite</i>	As soon as possible and convenient
	<b>Reason for urgency*</b> <i>Raison de l'urgence</i>	Evidence cut-off deadline is October 26, 2023

**In conformity with Article 3 of the Convention, the undersigned applicant has the honour to submit the following request:**

*En conformité de l'article 3 de la Convention, le requérant soussigné a l'honneur de présenter la demande suivante :*

<b>5. a</b>	<b>Requesting authority (Art. 3(a))</b> <i>Autorité requérante (art. 3(a))</i>	The Honorable William C. Bryson Visiting Judge, United States District Court, District of Delaware U.S. Court of Appeals Howard T. Markey National Courts Building 717 Madison Place, N.W. Washington, DC 20439-0000 Telephone: +1 202 275 8620
<b>b</b>	<b>To the Competent Authority of (Art. 3(a))</b> <i>À l'Autorité compétente de (art. 3(a))</i>	Sweden
<b>c</b>	<b>Names of the case and any identifying number</b> <i>Nom de l'affaire et numéro d'identification de l'affaire</i>	Plaintiff: Ryanair DAC Defendants: Booking Holdings Inc. et al.  Civil Action No. 20-01191-WCB

<b>6.</b>	<b>Names and addresses of the parties and their representatives (including representatives in the Requested State*) (Art. 3(b))</b> <i>Identité et adresse des parties et de leurs représentants (y compris représentants dans l'État requis) (art. 3(b))</i>	
<b>a</b>	<b>Plaintiff</b> <i>Demandeur</i>	Ryanair DAC Airside Business Park Swords Co. Dublin, Ireland
	<b>Representatives</b> <i>Représentants</i>	Anthony J. Fuga anthony.fuga@hklaw.com HOLLAND & KNIGHT LLP 150 N Riverside Plaza, Suite 2700 Chicago, IL 60606 Telephone: +001 312-263-3600
<b>b</b>	<b>Defendant</b> <i>Défendeur</i>	Booking Holdings Inc. Kayak Software Corporation Priceline.com LLC Agoda Company PTE. LTD Booking.com B.V.
	<b>Representatives</b> <i>Représentants</i>	Kristine A. Forderer COOLEY LLP 3 Embarcadero Center 20th Floor San Francisco, CA 94111-4004
<b>c</b>	<b>Other parties</b> <i>Autres parties</i>	N/A
	<b>Representatives</b> <i>Représentants</i>	N/A
<b>7. a</b>	<b>Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Art. 3(c))</b> <i>Nature et objet de l'instance (divorce, filiation, rupture de contrat, responsabilité du fait des produits, etc.) (art. 3(c))</i>	Violations of U.S. Computer Fraud and Abuse Act.
<b>b</b>	<b>Summary of complaint</b> <i>Exposé sommaire de la demande</i>	Defendants have violated various US federal laws through their unauthorized use and access of Ryanair's protected computers, directly and through the use of third parties, and have caused Plaintiff Ryanair to suffer damages
<b>c</b>	<b>Summary of defence and counterclaim*</b> <i>Exposé sommaire de la défense ou demande reconventionnelle</i>	N/A
<b>d</b>	<b>Other necessary information or documents*</b> <i>Autres renseignements ou documents Utiles</i>	N/A
<b>8. a</b>	<b>Evidence to be obtained or other judicial act to be performed (Art. 3(d))</b> <i>Actes d'instruction ou autres actes judiciaires à accomplir (art. 3(d))</i>	Evidence requested is listed on Attachments A and B
<b>b</b>	<b>Purpose of the evidence or judicial act sought</b> <i>But des actes à accomplir</i>	Defendants seek the evidence outlined in Attachments A and B to show the court at trial how the third parties used by Defendants are accessing Plaintiff Ryanair's computers

<b>9.</b>	<b>Identity and address of any person to be examined (Art. 3(e))*</b> <i>Identité et adresse des personnes à entendre (art. 3(e))</i>	Etraveli Group AB Dragarbrunnsgatan 46, 751 43 Uppsala Sweden Request that an appropriate Company representative be provided
<b>10.</b>	<b>Questions to be put to the persons to be examined or statement of the subject matter about which they are to be examined (Art. 3(f))*</b> <i>Questions à poser ou faits sur lesquels les personnes susvisées doivent être entendues (art. 3(f))</i>	Deposition questions for the above witness are listed on Attachment A
<b>11.</b>	<b>Documents or other property to be inspected (Art. 3(g))*</b> <i>Documents ou objets à examiner (art. 3(g))</i>	Documents to be viewed/inspected are listed on Attachment B
<b>12.</b>	<b>Any requirement that the evidence be given on oath or affirmation and any special form to be used (Art. 3(h))*</b> <i>Demande de recevoir la déposition sous serment ou avec affirmation et, le cas échéant, indication de la formule à utiliser (art. 3(h))</i>	It is requested that the testimony/answers be provided under legally sworn oath in accordance with the rules of evidence in the courts of Sweden.
<b>13.</b>	<b>Special methods or procedure to be followed (e.g., oral or in writing, verbatim transcript or summary, cross-examination, etc.) (Arts 3(i) and 9)*</b> <i>Formes spéciales demandées (déposition orale ou écrite, procès-verbal sommaire ou intégral, "cross-examination", etc.) (art. 3(i) et 9)</i>	Respectfully, the following are special requests. 1. It is requested that the testimony/answers provided by the witness be reduced to verbatim written transcript 2. It is requested that permission be granted to have a private court reporter/stenographer present to record testimony (at the expense of Plaintiff counsel) 3. It is requested that permission be granted to have an interpreter present (at the expense of Plaintiff counsel)
<b>14.</b>	<b>Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (Art. 7)*</b> <i>Demande de notification de la date et du lieu de l'exécution de la requête, de l'identité et de l'adresse de la ou des personnes à informer (art. 7)</i>	It is requested that counsel for Plaintiff, Anthony J. Fuga (contact information in item 6), be notified of any details relating to the execution of this Letter of Request, including but not limited to, the date, time and place of the requested deposition.
<b>15.</b>	<b>Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request (Art. 8)*</b> <i>Demande d'assistance ou de participation des magistrats de l'autorité requérante à l'exécution de la commission rogatoire (art. 8)</i>	It is respectfully requested that Plaintiff counsel be permitted to attend and participate in questioning the witnesses. It is further requested that all counsel listed in Item 6 above be granted permission to be in attendance (should they choose to do so)
<b>16.</b>	<b>Specification of privilege or duty to refuse to give evidence under the law of the Requesting State (Art. 11(b))*</b> <i>Spécification des dispenses ou interdictions de déposer prévues par la loi de l'État requérant (art. 11(b))</i>	The witness shall be given the privilege of refusing if giving such evidence would (1) subject them to a real and appreciable danger of criminal liability in the United States, or (2) disclose a confidential and privileged communication between them and their respective attorneys

17.	<b>The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by:*</b> <i>Les taxes et frais donnant lieu à remboursement en vertu de l'article 14, alinéa 2 et de l'article 26 seront réglés par :</i>	Any costs associated with acquisition, production, authentication or return of this evidence shall be the responsibility of Plaintiff counsel: Holland & Knight LLP, 150 N Riverside Plaza, Suite 2700, Chicago, IL 60606 USA
<b>Date of request</b> <i>Date de la requête</i>		
<b>Signature and seal of the requesting authority</b> <i>Signature et sceau de l'autorité requérante</i>		

\*Omit if not applicable / Ne remplir qu'en cas de nécessité

The Honorable William C. Bryson  
 Visiting Judge, United States District Court, District of Delaware  
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 Washington, DC 20439-0000  
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# **Letter of Request for Etraveli**

## **ATTACHMENT A**

**DEPOSITION QUESTIONS – Etraveli Group AB (“Etraveli”)**

1. How does Etraveli book Ryanair flights on behalf of, or for the benefit of, Defendants and Defendants’ customers?
2. When Etraveli is booking flights on behalf of, or for the benefit of, Defendants and Defendants’ customers, how does Etraveli book Ryanair flights when Ryanair.com requires a myRyanair user name and password to book a flight?
3. How does Etraveli book Ryanair flights when, upon first attempt, Etraveli was unable to complete a booking on behalf of, or for the benefit of, Defendants and Defendants’ customers?
4. What actions does Etraveli take to restore the ability to book Ryanair flights (whether successful or not) on behalf of, or for the benefit of, Defendants and Defendants’ customers?

**Letter of Request for Etraveli**  
**ATTACHMENT B**



**DOCUMENTS TO BE PRODUCED - Etraveli Group AB (“Etraveli”)**

**The time period of January 1, 2018 to June 28, 2023 applies to the issuance, creation or use of the below documents.**

1. Technical specifications, design specifications, software requirements specifications, system architecture reports and diagrams, annotated source code, source code, data source reports and diagrams, project proposals, final project reports, roadmaps, and release plans for how Etraveli books Ryanair flights on behalf of, and also for the benefit of, Defendants and Defendants’ customers.

2. Technical specifications, design specifications, software requirements specifications, system architecture reports and diagrams, annotated source code, source code, data source reports and diagrams, project proposals, final project reports, roadmaps, and release plans for when Etraveli attempted and was unable to book Ryanair flights, including what actions Etraveli took to restore the ability to book Ryanair flights (whether successful or not) on behalf of, or for the benefit of, Defendants and Defendants’ customers.

3. Software updates, software release notes, test plans, test standards, and test results for how Etraveli books Ryanair flights on behalf of, and also for the benefit of, Defendants and Defendants’ customers.

4. Software updates, software release notes, test plans, test standards, and test results, for when Etraveli attempted and was unable to book Ryanair flights, including what actions Etraveli took to restore the ability to book Ryanair flights (whether successful or not) on behalf of, or for the benefit of, Defendants and Defendants’ customers.

5. System specifications, system administrator guides, end-user guides, installation guides, help guides, tutorials, and manuals for how Etraveli books Ryanair flights on behalf of, and also for the benefit of, Defendants and Defendants’ customers.

6. System specifications, system administrator guides, end-user guides, installation guides, help guides, tutorials, and manuals for when Etraveli attempted and was unable to book Ryanair flights, including what actions Etraveli took to restore the ability to book Ryanair flights (whether successful or not) on behalf of, or for the benefit of, Defendants and Defendants' customers.

7. Application Programming Interface ("API") project proposals, API final project reports, API technical specifications, API design specifications, API reports, API guides, API tutorials, API release notes, API work instructions, annotated API source code, API source code, data source reports and diagrams, and external API reports and diagram used in Etraveli's software for how Etraveli books Ryanair flights on behalf of, and also for the benefit of, Defendants and Defendants' customers.

8. Application Programming Interface ("API") project proposals, API final project reports, API technical specifications, API design specifications, API reports, API guides, API tutorials, API release notes, API work instructions, annotated API source code, API source code, data source reports and diagrams, and external API reports and diagram used in Etraveli's software for when Etraveli attempted and was unable to book Ryanair flights, including what actions Etraveli took to restore the ability to book Ryanair flights (whether successful or not) on behalf of, or for the benefit of, Defendants and Defendants' customers.

9. Information Technology ("IT") tickets, and software development tickets for how Etraveli books Ryanair flights on behalf of, and also for the benefit of, Defendants and Defendants' customers.

10. Information Technology ("IT") tickets, and software development tickets for when Etraveli attempted and was unable to book Ryanair flights, including what actions Etraveli took to

restore the ability to book Ryanair flights (whether successful or not) on behalf of, or for the benefit of, Defendants and Defendants' customers.

11. Internal emails, chat messages, phone call transcripts, phone call recordings, phone call summaries, and customer relationship manager entries with third parties for how Etraveli books Ryanair flights on behalf of, or for the benefit of, Defendants and Defendants' customers.

12. Internal emails, chat messages, phone call transcripts, phone call recordings, phone call summaries, and customer relationship manager entries with third parties for when Etraveli attempted and was unable to book Ryanair flights, including what actions Etraveli took to restore the ability to book Ryanair flights (whether successful or not) on behalf of, and also those for the benefit of, Defendants and Defendants' customers.